

EXHIBIT 7



United States of America
FEDERAL TRADE COMMISSION
BUREAU OF CONSUMER PROTECTION
600 PENNSYLVANIA AVENUE NW, CC-9528
WASHINGTON, DC 20580

Reenah L. Kim
Division of Enforcement
(202) 326-2272
rkim1@ftc.gov

November 10, 2022

VIA ELECTRONIC MAIL

Robert A. Zink, Esq. (robertzink@quinnemanuel.com)
Daniel Koffmann, Esq. (danielkoffmann@quinnemanuel.com)
Quinn Emanuel Urquhart & Sullivan, LLP
1300 I Street NW, Suite 900
Washington, DC 20005

Re: *In the Matter of Twitter, Inc., Docket No. C-4316*

Dear Counsel:

We recently learned that, in addition to the lay-offs Twitter, Inc. (“Twitter” or the “Company”) conducted on or about November 4, 2022, significant numbers of personnel are choosing to resign their employment at the Company. Specifically, among other departures, it was reported that Chief Information Security Officer Lea Kissner, Chief Privacy Officer Damien Kieran, and Chief Compliance Officer Marianne Fogarty all resigned last night.

Additionally, in a note posted to Twitter’s Slack and viewable by all staff, an employee on the Company’s privacy team reportedly noted that Alex Spiro, the current head of Twitter Legal, said Elon Musk is “willing to take on a huge amount of risk in relation to this company and its users, because ‘Elon puts rockets into space, he’s not afraid of the FTC.’” Moreover, the poster stated that, because of the tight SLAs between product inception and launch, Musk’s legal department will shift the burden to engineers to “self-certify” compliance with the FTC Order and other privacy laws, and it is anticipated that staff will be “pressured by management into pushing out changes that will likely lead to major incidents. All of this is extremely dangerous for our users. Also, given that the FTC can (and will!) fine Twitter BILLIONS of dollars pursuant to the FTC Consent Order, extremely detrimental to Twitter’s longevity as a platform.”¹

¹ See Heath, A. (2022, Nov. 10), *Elon is putting Twitter at risk for billions in fines, says internal letter*, The Verge, <https://www.theverge.com/2022/11/10/23451198/twitter-ftc-elon-musk-lawyer-changes-fine-warning>.

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Pursuant to Part XIII of the Federal Trade Commission’s May 26, 2022, Order in the above-referenced matter (“Order”), we ask that Twitter submit by **November 25, 2022**, a true and accurate written report, sworn under penalty of perjury, that addresses the following requests, and produce the requested documents and other information:

1. State how many employees and contractors have resigned from the Company or given notice since October 27, 2022, both as an absolute number and as a percentage of total workforce. As part of Your² response:
 - a. Identify the departments, divisions, and/or teams in which the departed (or soon-to-be-departed) personnel worked (e.g., Corporate Security, Application Security, Detection and Response Team (DART), Data Management, Enterprise Security, IT, Internal Audit, Privacy & Data Protection, Platform Security, Security Risk Management, Security Governance – Risk and Compliance, Security Architecture and Engineering);
 - b. State how many personnel resigned or gave notice from each department, division, and/or team, both as an absolute number and as a percentage of the total headcount in that particular department, division, and/or team; and
 - c. Describe the job functions that the departed (or soon-to-be-departed) personnel performed, including whether they had management or leadership responsibilities.
2. State whether, in connection with the recent or forthcoming departures, You performed or are performing any reorganization or restructuring of any teams with job duties or responsibilities relating to privacy or information security and, if so, explain how this was done or how You plan to execute such reorganization or restructuring. As part of Your response, specify the date(s) when any such reorganization or restructuring was completed or is expected to be completed.
3. State whether You can properly protect consumers’ information and comply with the Order – including Your obligation to establish, implement, and maintain a comprehensive privacy and information security program that protects the privacy, security, confidentiality, and integrity of Covered Information – despite the recent departures, and explain the basis for Your response.
4. Produce all notes, documentation, and recordings of or relating to all calls placed to the Twitter Ethics Hotline (800-275-4843) since October 27, 2022.
5. Produce copies of all reports, complaints, and communications made to ethicshelpline.twitter.com since October 27, 2022.

² For purposes of these requests, “You” and “Your” shall mean Twitter, Inc., its successors and assigns, and any business it controls directly or indirectly, and all directors, officers, members, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

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6. Produce all communications involving Lea Kissner, Damien Kieran, or Marianne Fogerty since October 27, 2022. For any communications You withhold or redact based on a privilege You seek to assert, submit a detailed privilege log providing the basis for each such claim.
7. Produce all Slack communications (whether on a Slack channel or via direct message on Slack) post-dating October 26, 2022, that include, respond to, or reference communications involving the terms “FTC,” “Federal Trade Commission,” “privacy,” “data protection,” “DP,” “security,” “infosec,” or “seceng.”
8. Twitter recently announced a new version of the product/subscription service called “Twitter Blue.”³ With respect to Twitter Blue:
 - a. Describe in detail what the product/service does, including any features and services that are offered or provided in connection with Twitter Blue, and any changes made to the product/service since it was first announced.
 - b. Specify each type of Covered Information⁴ the Twitter Blue product/service collects. For each:
 - 1) State each of the purposes for which You use or plan to use the Covered Information;
 - 2) State whether You disclose or share (such as by providing access to) the Covered Information with any third party or plan to do so in the future and, if so, identify the third parties and the purpose(s) for which the information is disclosed or shared.
 - c. Produce screenshots of all representations You make or have made to consumers regarding Twitter Blue, including but not limited to: all Tweets by Elon Musk or other Twitter personnel; in-product pop-ups, promotions, notices, banners, and other notifications; app store descriptions; Help Center articles; Company blog posts; consent flows; and all other user interfaces involved in the promotion, enrollment, and cancellation of Twitter Blue.
 - d. Specify the date when You first conceived of the concept for Twitter Blue and the date(s) when You first made Twitter Blue available to consumers.
 - e. State whether You conducted the assessments and reviews specified under Part V.E.1. through 3. of the Order for the Twitter Blue product/service.

³ <https://help.twitter.com/en/managing-your-account/about-twitter-verified-accounts>

⁴ For purposes of these requests, “Covered Information” has the same meaning as set forth in the Order, Definition B.

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- 1) If You did – produce all contemporaneous documentation of any such assessments and reviews, including documentation of actions taken and actions not taken to resolve items identified by the review or assessment, and identify the team(s) responsible for conducting these assessments and reviews, including the individual team leader(s) responsible for these efforts.
- 2) If You did not – explain why not.

* * * * *

Please have a responsible corporate officer or manager of Twitter certify under penalty of perjury that the written report(s) submitted in response to this letter is complete and accurate, and that the report(s) and accompanying document production(s) represent all information responsive to the FTC's requests.

All information provided in response to these requests must be submitted in an electronic format agreed upon by a Commission representative in writing prior to the submission. So that the FTC has the capability of reading and using the data, please ensure that the submission of Electronically Stored Information ("ESI") complies with the Production Instructions provided to you in connection with a prior demand letter, and contact us in advance to arrange for the electronic submission of materials via SFTP. Please send an electronic copy of your responses to the Commission at DEBrief@ftc.gov, with copies to rkim1@ftc.gov.

Finally, Twitter should suspend any routine procedures for document destruction and take other measures to preserve all records relating to the matters addressed in this letter, including electronically stored records that are stored on backup media and all physical records stored offsite, in a form that includes the complete record.

Sincerely,



Reenah L. Kim

cc: Lisa K. Hsiao, USDOJ
Zachary L. Cowan, USDOJ
Deborah S. Sohn, USDOJ